

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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ASIAN-AMERICAN LICENSED  
BEVERAGE ASSOCIATION, *et al.*,

Plaintiffs,

v.

CITY OF PHILADELPHIA, *et al.*,

Defendants.

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Civil Action  
No. 24-6348-JLS

**ORDER**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2025, upon consideration of Defendants City of Philadelphia and Mayor Cherelle Parker's Motion for Leave to File Memorandum of Law in Excess of Page Limit, it is hereby **ORDERED** that the Motion is **GRANTED** and the City may file a Memorandum of Law in opposition to Plaintiffs' Motion for Preliminary Injunction in excess of the applicable page limit, not to exceed the length of Plaintiffs' Memorandum of Law in Support of their Motion.

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Jeffrey L. Schmehl, J.

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Civil Action  
No. 24-6348-JLS

**DEFENDANT CITY OF PHILADELPHIA’S MOTION  
FOR LEAVE TO FILE MEMORANDUM OF LAW IN EXCESS OF PAGE LIMIT**

Defendants City of Philadelphia and Mayor Cherelle Parker (collectively, “City”) ask this Court for permission to file a memorandum of law in excess of the applicable page limit and state the following in support thereof:

1. On November 26, 2024, Plaintiffs filed the Complaint.
2. On the same day, Plaintiffs filed a Motion for Temporary Restraining Order, Preliminary Injunction, and Expedited Discovery. ECF No. 3.
3. The Court denied Plaintiffs’ request for a TRO, scheduled a hearing on the request for a preliminary injunction for March 19, 2025, and ordered expedited discovery in advance of the hearing. ECF No. 14.
4. In response to Defendants’ Motions to Dismiss the Complaint, Plaintiffs filed an Amended Complaint on January 27, 2025, adding additional Defendants Mayor Cherelle Parker and Pennsylvania Attorney General David Sunday. ECF No. 28.
5. On the same day, Plaintiffs filed a new Motion for Preliminary Injunction with a Memorandum of Law in support consisting of fifty-six pages. ECF No. 29.

6. This Court's Individual Rules limit all briefs and memoranda of law to twenty-five pages absent leave of Court. *See* Policies & Procedures at 5, <https://www.paed.uscourts.gov/sites/paed/files/documents/procedures/scmpol.pdf>.

7. Defendant City respectfully requests leave to file a memorandum of law in opposition to Plaintiffs' Motion in excess of twenty-five pages, not to exceed the length of Plaintiffs' Memorandum of Law.

8. The City submits that it must exceed the page limit to adequately brief the preliminary injunction standard in light of the twelve-count, 348-paragraph Amended Complaint and the arguments raised in Plaintiffs' fifty-six page Memorandum.

Date: February 6, 2025

Respectfully submitted,

PHILADELPHIA LAW DEPARTMENT  
RENEE GARCIA, CITY SOLICITOR

/s/ Ryan B. Smith

MELISSA MEDINA

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*Counsel for Defendants City of Philadelphia and  
Mayor Cherelle Parker*

**CERTIFICATE OF SERVICE**

I, Ryan B. Smith, hereby certify that on February 6, 2025, I caused a true and correct copy of the foregoing Defendant City's Motion for Leave to File Memorandum of Law in Excess of Page Limit to be served via CM/ECF filing upon counsel for all parties.

Date: February 6, 2025

/s/ Ryan B. Smith  
Ryan B. Smith  
Deputy City Solicitor